

1 JONATHAN G. LATTIE, ESQ.
Nevada State Bar No. 7058
2 TERESA A. LIBERTINO, ESQ.
Nevada State Bar No. 9103
3 **LATTIE | MALANGA | LIBERTINO, LLP**
7945 West Sahara Avenue, Suite 108
4 Las Vegas, Nevada 89117
(702) 655-4949

5 DAVID T. PURSIANO, ESQ.
6 Nevada State Bar No. 5464
7 LAUREL L. BARRY, ESQ.
Nevada State Bar No. 10311
8 **PURSIANO BARRY BRUCE LAVELLE, LLP**
851 S. Rampart Blvd., Ste. 260
9 Las Vegas, NV 89145

10 Attorneys for Plaintiffs

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**
13

14 BRITTANY & ANTHONY LOPEZ, Husband
and Wife; PAULA EARL-MCCONICO &
15 WILLIE MCCONICO, Husband and Wife;
MARTIN & VERONICA FREEMAN, Husband
16 and Wife; TIMMY LE & NGUYEN TRINH,
Husband and Wife; GERDA PIERROT;
17 SHAWN YBARRA; SHELBY MCEVOY &
KENNETH PFEIFER, Husband and Wife;
18 PABLO ECHEVARRIA & PATREASE
ASHLEY, Husband and Wife; NICHOLAS
19 SPELDRIK & MARYANN UNDIS; SHUREN
ZHANG & PING YUE, Husband and Wife;
20 ROBYN COOPER; LINDA YARBROUGH;
SOON LEWIS; NICOLE JENKINS;
21 MATTHEW BACHMAN & TIMOTHY
THOMPSON; STEVE FELDMAN; JENNIFER
22 DURHAM; JENNIFER HOUGHLAND; SETH
& KRISTAL MACKERT, Husband and Wife;
23 LILLIE A BANKS; NATHAN & KYLEE
REEDER; DEREK BAO & NICOLE
24 SHINAVER, Husband and Wife; JEROME A
REYES; PAUL E. MELENDEZ; SCOTT &
25 HOLLY WORTLEY, Husband and Wife,

26 Plaintiffs,

27 v.

28 U.S. HOME CORPORATION AND

Case No. 2:16-cv-01754-GMN-CWH

**STIPULATION AND ORDER
CONTINUING DATE FOR PLAINTIFFS'
RESPONSE TO DEFENDANTS' MOTION
TO DISMISS PLAINTIFFS' COMPLAINT
AND DATE TO FILE JOINT STATUS
REPORT AND MOVE FOR REMAND**

(First Request)

1 GREYSTONE NEVADA, LLC; and DOES 1
2 through 100, inclusive,
3 Defendants.

4 Plaintiffs and Defendants by and through their respective counsel hereby stipulate to extend
5 Plaintiffs' time for responding to Defendants' motion to dismiss Plaintiffs' complaint by fifteen (15)
6 days to **September 2, 2016**. Defendants' motion to dismiss Plaintiffs' complaint was filed on August
7 1, 2016. (ECF No. 5). Plaintiffs' response to Defendants' motion to dismiss the complaint is
8 currently due on August 18, 2016. Pursuant to this stipulation, Plaintiffs' response will be due on
9 September 2, 2016. This extension is requested because Plaintiffs need additional time to respond to
10 Defendants' motion and because the parties are discussing a potential agreement to resolve some, if
11 not all of the case or issues that are the subject of Defendants' motion. This is the first stipulation for
12 an extension of the Plaintiffs' time to respond to Defendants' motion to dismiss Plaintiffs' complaint.
13

14 In following, and to help promote the parties attempt to agree on resolution of some, if not all
15 pending claims, Plaintiffs and Defendants also stipulate to extend the date to provide a Joint Status
16 Report by fifteen (15) days to September 8, 2016 and for Plaintiffs to motion the Court to remand the
17 case to State Court by fifteen (15) days to September 8, 2016.
18

19 **ORDER**

20 **IT IS HEREBY ORDERED** that the deadline for Plaintiffs to file a response to Defendants'
21 Motion to Dismiss is extended to September 2, 2016.

22 **IT IS FURTHER ORDERED** that the parties' deadline to file a joint status report is extended
23 to September 8, 2016.

24 **IT IS FURTHER ORDERED** that the parties' request to extend the deadline to file a motion
25 to remand is **DENIED**. Pursuant to 28 U.S.C. § 1447, "[a] motion to remand the case on the
26 basis of any defect other than lack of subject matter jurisdiction must be made within 30 days
27 after the filing of the notice of removal under section 1446(a)."

28 DATED this 23 day of August, 2016.


UNITED STATES DISTRICT COURT JUDGE

1 ///

2 Defendants filed their Petition for Removal on July 25, 2016. (ECF No. 1) This is the first

3 stipulation for extensions of time to provide a Joint Status Report and Motion to Remand.

4

5

6 DATED this 17th day of August, 2016

DATED this 17th day of August, 2016

7 **LATTIE MALANGA LIBERTINO, LLP**

PAYNE & FEARS LLP

8

9 By: 

By: /s/ Gregory H. King

Jonathan G. Lattie, NV Bar No. 7058
7945 W. Sahara Ave., Ste. 108
Las Vegas, NV 89117
Tel. (702) 655-4949
Attorneys for Plaintiffs

Gregory H. King, NV Bar No. 7777
Sarah Odia, NV Bar No. 11053
7251 W. Lake Mead Blvd., Suite 525
Las Vegas, Nevada 89128
Tel. (702) 851-0300
Attorneys for Defendants

13

14 DATED this 17th day of August, 2016

15 **PURSIANO BARRY BRUCE**
16 **LAVELLE, LLP**

17 By: /s/ David T. Pursiano

David T. Pursiano, NV Bar No. 5464
Laurel L. Barry, NV Bar No. 10311
851 S. Rampart Blvd., Ste. 260
Las Vegas, NV 89145
Attorneys for Plaintiffs